

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the
District of New Jersey

____ Division

RECEIVED

JAN 03 2022

AT 8:30
WILLIAM T. WALSH
CLERK

Denard C. Trapp

Case No. _____

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Kevin Downey

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Denard C. Trapp
Street Address	17 Steven Ave
City and County	Tinton Falls Monmouth County
State and Zip Code	New Jersey
Telephone Number	732-539-9577
E-mail Address	MR1Trapp@aol.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name	Kevin Downey
Job or Title (if known)	
Street Address	18 Marland Lane
City and County	Tintin Falls, Monmouth
State and Zip Code	New Jersey, 07724
Telephone Number	
E-mail Address (if known)	

Defendant No. 2

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

Defendant No. 3

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

Defendant No. 4

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Perjury, possession of stolen property N.J.S.A. 2C:20-7, under false pretenses; in criminal law, property is obtained by false pretenses when the acquisition results from intentional misrepresenting of a past or existing fact. Therefore the person who obtains ownership of property by deceit does not obtain full title to the property; only a voidable title.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Denard C. Trapp, is a citizen of the
State of *(name)* New Jersey.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* Kevin Downey, is a citizen of
the State of *(name)* New Jersey. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

Or is incorporated under the laws of *(foreign nation)* _____, and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

700,000.00

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Mr. Kevin Downey knowingly give false testimony of a pertinent nature during trial 18-11-01516-I. Then submitted or declared, contradictory statements to the "Superior Court of New Jersey Appellate Division for docket No. A-4178-18. This denied me due process and a fair trial, years of my life and year from my children.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I demand an immediate return of my home and the funds mentioned in b. 3. 700,000.00 to repair it to a livable condition, and Mr. Kevin Downey prosecuted for the crime he committed. Because of Mr. Kevin Downey willful defamation, I was denied my mother's remaining days on this earth for I was one of my mother's caregivers as well as irreparable harm to my children and mine relationship. So for that, I deserve 10,000,000.00

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The attached documents are as follows; Latter from State of New Jersey Department of Treasury, certifying GDBT 1 TRUST 2011-1 has no records. Which bars them from commencing any litigation in the state pursuant to N.J.S.A. 14A:13-11 (1), Foreclosure Case Information Statement the caption state only "GDBT 1 TRUST 2011-1 vs. Denard C. Trapp, et. al. date filed April 4, 2013, Contesting Answer, and Affirmative Defenses filed on June 5, 2013, The Superior Court of New Jersey Appellate Division Docket No. A-4178-18 where Mr. Downey told willful inconsistencies, last but not least, the "WRIT of EXECUTION" dated 9/22/2014 which is a flawed document.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12/28/2021

Signature of Plaintiff

Printed Name of Plaintiff

Denard C. Trapp
Denard C. Trapp

B. For Attorneys

Date of signing: 12/28/2021

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

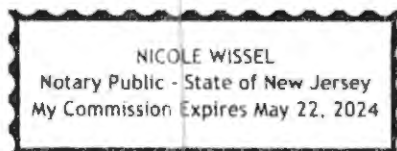
Street Address

State and Zip Code

Telephone Number

E-mail Address

Denard C. Trapp
Denard C. Trapp



Nicole Wisser 12/28/21 Page 5 of 5